



BOIES
SCHILLER
FLEXNER

MATTHEW L. SCHWARTZ
Tel: (212) 303-3646
Email: mlschwarz@bsfllp.com

April 23, 2024

BY ECF

The Honorable John G. Koeltl
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

**APPLICATION GRANTED
SO ORDERED**

John G. Koeltl
4/24/24
John G. Koeltl, U.S.D.J.

Re: *City of Almaty, Kazakhstan, et al. v. Felix Sater, et al.,*
Case No. 19 Civ. 2645 [rel. 15 Civ. 5345] (JGK) (KHP)

Dear Judge Koeltl:

We represent Plaintiffs City of Almaty, Kazakhstan and BTA Bank (the “Kazakh Entities”) and write pursuant to Rule 21.8 of the Electronic Case Filing Rules & Instructions of the United States District Court for the Southern District of New York and Paragraph 8 of the Court’s Stipulated Protective Order in this case [ECF No. 51] to request that the Court accept for provisional filing under seal certain exhibits appended to the Declaration of Matthew L. Schwartz In Support of The Kazakh Entities’ Opposition to Defendants Daniel Ridloff and RRMI-DR LLC’s Motion *In Limine* to Preclude and Limit the Trial Testimony of Certain Expert and Other Witnesses.

Among the documents that the Kazakh Entities cite in their opposition are documents that have been designated confidential by the defendants or their agents in this action. As such, the Kazakh Entities request that the Court maintain these exhibits under seal until such time that the Defendants can explain why the materials should remain under seal. The Court recently granted similar requests by the Kazakh Entities to provisionally seal portions of briefing and exhibits. [ECF Nos. 477, 1782]. To be clear, the Kazakh Entities take no position on the sealing of these papers.

We thank the Court for its attention to this matter.

Respectfully,

/s/ Matthew L. Schwartz

Matthew L. Schwartz

BOIES SCHILLER FLEXNER LLP